

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:	)	)
	)	Chapter 11
	)	
TEHUM CARE SERVICES, INC.,	)	Case No. 23-90086 (CML)
	)	
Debtor.	)	

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**WITNESS AND EXHIBIT LIST**

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Judge:	Hon. Christopher M. Lopez
Hearing Date:	Friday, March 3, 2023
Hearing Time:	1:00 p.m. (Central Standard Time)
Party's Name:	Hector Garcia, Jr., Adam Baker, Antonio Reali, David Wichterman, Jr., Eileen McNamara, and Clarence Dean (collectively, the " <u>Claimants</u> ")
Attorney's Name:	R. J. Shannon
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	Hearing on: <ul style="list-style-type: none"> <li>• Debtor's Emergency Motion to Extend and Enforce the Automatic Stay [ECF No. 7] (the "<u>Stay Extension Motion</u>")</li> </ul>

The Claimants, tort claimant creditors of the debtor in the above-captioned case, hereby submit this witness and exhibit list in connection with the hearing to be held on March 3, 2023, at 1:00 p.m. (Central Standard Time) (the "Hearing") on the Stay Extension Motion.

**WITNESSES**

The Claimants may call any of the following witnesses at the hearing, whether in person or by proffer:

1. Any witness listed or called by any other party; and
2. Rebuttal witnesses as necessary.

**EXHIBITS**

The Claimants may offer for admission into evidence any of the following exhibits, and any exhibit designated by any other party, at the Hearing:

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
1	Docket Sheet for Wichterman v. City of Philadelphia et al., Case No. 16-cv-05796-JMY (E.D.P.A.)				
2	Memorandum Opinion re Summary Judgement in Wichterman v. City of Philadelphia et al., Case No. 16-cv-05796-JMY (E.D.P.A.)				
3	Docket Sheet for McNamara v. City of Philadelphia et al., Case No. 20-cv-04570-RBS (E.D.P.A.)				
4	Complaint in McNamara v. City of Philadelphia et al., Case No. 20-cv-04570-RBS (E.D.P.A.)				
5	Docket Sheet for Reali v. Board of County Commissioners for the County of Dona Ana et al., Case No. 19-cv-00603-MV-GBW (D.N.M.)				
6	Amended Complaint in Reali v. Board of County Commissioners for the County of Dona Ana et al., Case No. 19-cv-00603-MV-GBW (D.N.M.)				
7	Docket Sheet for Garcia v. Board of County Commissioners for the County of Dona Ana et al., Case No. 21-cv-00485-DHU-GJF (D.N.M.)				
8	Second Amended Complaint in Garcia v. Board of County Commissioners for the County of Dona Ana et al., Case No. 21-cv-00485-DHU-GJF (D.N.M.)				
9	Docket Sheet for Baker v. Corizon Health Inc. et al., Case No. 22-cv-00152-KWR-KRS (D.N.M.)				

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
10	Complaint Baker v. Corizon Health Inc. et al., Case No. 22-cv-00152-KWR-KRS (D.N.M.)				
11	Docket Sheet for Brown v. McNeil et al., Case No. 19-cv-00345-MW-MAF (N.D. Fla.)				
12	Complaint in Brown v. McNeil et al., Case No. 19-cv-00345-MW-MAF (N.D. Fla.)				
13	Docket Sheet for Frederick v. McNeil et al., Case No. 19-cv-00162-MW-MAF (N.D. Fla.)				
14	Amended Complaint in Frederick v. McNeil et al., Case No. 19-cv-00162-MW-MAF (N.D. Fla.)				
15	Plaintiff's Notice of Settlement as to Sheriff McNeil Only in Frederick v. McNeil et al., Case No. 19-cv-00162-MW-MAF (N.D. Fla.)				

The Claimants reserve the right to supplement, amend or delete any witness and exhibits prior to the hearing. The Claimants also reserve the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Claimants finally reserve the right to introduce exhibits previously admitted.

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Dated: March 1, 2023

**SHANNON & LEE LLP**

/s/ R. J. Shannon

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*Bankruptcy Counsel to the Claimants for the  
Limited Purpose of Responding to the Stay  
Extension Motion*